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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
And the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04336 (SMB)

v.

THE ESTATE (SUCCESSION) OF DORIS
IGOIN, LAURENCE APFELBAUM,
individually and in her capacities as executor and
beneficiary of the Estate (Succession) of Doris
Igoin, and EMILIE APFELBAUM,

Defendants.

**CERTIFICATE OF NO OBJECTION OF TRUSTEE'S MOTION FOR ENTRY OF
ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE AND
RULES 2002 AND 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
APPROVING SETTLEMENT AGREEMENT BY AND AMONG
THE TRUSTEE, LAURENCE APFELBAUM AND EMILIE APFELBAUM**

Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* ("SIPA") and the chapter 7 estate of Bernard L. Madoff ("Madoff"), by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On June 2, 2017, the Trustee filed the Motion for Entry of an Order Pursuant to Section 105(a) of the Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement by and among the Trustee and Laurence Apfelbaum and Emilie Apfelbaum (the "Motion") (Adv. Pro. No. 10-04336 (SMB), ECF 182).
2. The deadline for filing objections to the Motion expired on June 21, 2017 at 4:00 p.m. A hearing on the Motion has been scheduled for June 28, 2017 at 10:00 a.m.
3. Notice of Motion was provided by U.S. Mail, postage prepaid or email to (i) defendants in the adversary proceeding; (ii) all parties included in the Master Service List as

defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the Acting United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and, to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of the proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

[Remainder of page intentionally left blank.]

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: New York, New York
June 23, 2017

Respectfully submitted,

/s/ Ona T. Wang

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